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7 Attorney for Reynaldo Stocker

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 REYNALDO STOCKER,  
15 Defendant.  
16

Case No. 2:20-cr-00287-JAD-BNW

**STIPULATION TO CONTINUE  
PRETRIAL MOTION DEADLINES**  
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
18 Acting United States Attorney, and Mina Chang, Assistant United States Attorney, counsel  
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for Reynaldo Stocker,  
21 that the previously ordered deadline for filing of pretrial motions be vacated and that the parties  
22 herein shall have to and including June 24, 2021, within which to file the Defendant's pretrial  
23 motions currently due May 27, 2021.

24 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
25 shall have to and including July 8, 2021, to file any and all responsive pleadings, currently due  
26 June 10, 2021.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including July 15, 2021, to file any and all replies to dispositive motions,  
3 currently due June 17, 2021.

4 The Stipulation is entered into for the following reasons:

5 1. Counsel for the defendant needs additional time to review the discovery,  
6 research, and prepare pretrial motions.

7 2. The defendant is not incarcerated and does not object to the continuance.

8 3. The parties agree to the continuance.

9 4. The additional time requested herein is not sought for purposes of delay, but  
10 merely to allow counsel for defendant sufficient time within which to review the discovery  
11 research and prepare pretrial motions.

12 5. Additionally, denial of this request for continuance could result in a miscarriage  
13 of justice.

14 This is the second stipulation to continue filed herein.

15 DATED this 26th day of May 2021.

16 RENE L. VALLADARES  
17 Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

18 */s/ Nisha Brooks-Whittington*  
19 By \_\_\_\_\_

*/s/ Mina Chang*  
By \_\_\_\_\_

20 NISHA BROOKS-WHITTINGTON  
Assistant Federal Public Defender

MINA CHANG  
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

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4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 REYNALDO STOCKER,

8 Defendant.

Case No. 2:20-cr-00287-JAD-BNW

FINDINGS OF FACT, CONCLUSIONS  
OF LAW AND ORDER

9  
10 **FINDINGS OF FACT, CONCLUSIONS OF LAW**

11 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
12 Court finds that:

13 1. Counsel for the defendant needs additional time to review the discovery,  
14 research, and prepare pretrial motions.

15 2. The defendant is not incarcerated and does not object to the continuance.

16 3. The parties agree to the continuance.

17 4. The additional time requested herein is not sought for purposes of delay, but  
18 merely to allow counsel for defendant sufficient time within which to discuss the proposed  
19 resolution with his client.

20 5. Additionally, denial of this request for continuance could result in a miscarriage  
21 of justice.

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**ORDER**

IT IS THEREFORE ORDERED that the parties herein shall have to and including June 24, 2021, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including July 8, 2021, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including July 15, 2021, to file any and all replies to dispositive motions.

DATED : June 8, 2021



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UNITED STATES MAGISTRATE JUDGE